
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (US EPA)
REGION 6, 1445 ROSS AVENUE, DALLAS, TX 75202

EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW ACT (EPCRA)
SECTION 313 INSPECTION REPORT

Report date: July 8, 2014
Revised: July 24, 2014

I. ESTABLISHMENT COVERED BY THIS INSPECTION

This inspection reports covers only Georgia-Pacific Chemicals LLC which reported as a separate establishment. The other two Georgia-Pacific establishments (the Crossett Paper Operations and the Plywood/Stud Mill) will be covered in separate inspection reports.

II. FACILITY INSPECTED

Inspection date: March 20, 2014

Name & address:

Georgia-Pacific Chemicals LLC
Highway 82 & Paper Mill Road
Crossett, AR 71635
870-567-7200

Mailing address:

Georgia-Pacific Chemicals LLC
PO Box 520
Crossett, AR 71635

Parent:

Koch Industries, Inc.
DUNS: 006944334

III. GEORGIA-PACIFIC CROSSETT, ARKANSAS COMPLEX

The Georgia-Pacific Crossett, Arkansas Complex has consisted of the three establishments shown below over the period of the inspections

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Chemicals Operations establishment (2008 to 2012, five years)

CHEMICALS OPERATIONS

NAICS code	Primary	Description
325211	Yes	Plastics material and resin manufacturing
325199	No	All other basic organic chemical manufacturing
325191	No	Gum and wood chemical manufacturing (2007 NAICS code. Discontinued in 2012)
325194	No	Gum and wood chemical manufacturing (new NAICS code for 2012)

Plywood/Stud Mill establishment (2008 to 2011, four years) (operations at this establishment were idled in October 2011)

PLYWOOD/STUD MILL

NAICS code	Primary	Description
321212	Yes	Softwood veneer and plywood manufacturing
321113	No	Sawmills

Pulp and Paper Operations establishment (2008 to 2012, five years)

PULP AND PAPER OPERATIONS

NAICS code	Primary	Description
322110	Yes	Pulp mills
322121	No	Paper (except newsprint) mills
322130	No	Paperboard mills

The reporting by year for each establishment is shown in the table below:

REPORTING YEARS FOR EACH ESTABLISHMENT

Establishment	2012	2011	2010	2009	2008
Chemicals Operations	Reported	Reported	Reported	Reported	Reported
Plywood/Stud Mill	**Note 1**	Reported	Reported	Reported	Reported
Pulp and Paper Operations	Reported	Reported	Reported	Reported	Reported

Note 1: The Plywood/Stud Mill idled operations in October 2011 (Attachment 1).

IV. SEND REPLY TO

The reply to the inspection report should be sent to:

Molly A. Matthews
Plant Manager
Georgia-Pacific Chemicals
PO Box 520
Crossett, AR 71635
870-567-7240
Cell: 916-730-4014
Email: molly.matthews@gapac.com

The senior manager at the facility is:

Molly A. Matthews
Plant Manager
Georgia-Pacific Chemicals LLC
PO Box 520
Crossett, AR 71635
870-567-7240
Cell: 916-730-4014
Email: molly.matthews@gapac.com

V. INTRODUCTION

EPCRA (Emergency Planning and Community Right to Know Act) § 313 is also referred to as the TRI (Toxic Release Inventory). TRI is the actual name of the database which houses the information collected pursuant to EPCRA § 313.

This report documents the March 20, 2014, Emergency Planning and Community Right to Know Act (EPCRA) § 313 inspection of Georgia-Pacific Chemicals LLC located in Crossett, Arkansas. The inspection was to determine compliance with EPCRA § 313 TRI (Toxic Release Inventory) reporting requirements. The inspection covered the reporting years 2008 to 2012.

The Arkansas Department of Emergency Management was notified prior to the inspection as a courtesy (Attachment 2). No state has primary enforcement under EPCRA § 313.

The following information applies to the facility:

TRI identification number: 71635grgpcpaper
NAICS code: Primary 325211, plastics material and resin manufacturing
325199, all other basic organic chemical manufacturing
325191, gum and wood chemicals manufacturing (2007 NAICS Listing. Discontinued for 2012 NAICS listing) (Attachment 3)
325194. Gum and wood chemicals manufacturing (New NAICS for 2012) (Attachment 3)
DUNS numbers: 009020777, 132076480 (shown on the 2012 Form R, Attachment 4)
Lat: 33.13847 (FRS, no collection method shown) (Attachment 5)
Lon: -91.96584 (FRS, no collection method shown) (Attachment 5)
Web site: www.gp.com
Facility/parent state of incorporation: Delaware (Attachment 3)

VI. BUSINESS RELATED INFORMATION

Information from the establishment's web site is shown in Attachments 6 and 7.

Information from the 2010 Arkansas Manufacturers Register is shown in Attachment 8.

GP's Crossett Chemical Facility consists of five distinct operating plants: the Tall Oil Manufacturing Plant, Liquid Resin Manufacturing Plant, Spray Dry Resin Manufacturing Plant and Formaldehyde and Urea Formaldehyde Concentrate (UFC) Manufacturing Plant. The Crossett Chemical Facility is part of a multi-establishment facility which also includes a paper mill, plywood plant and stud mill (Attachment 3).

VII. ENVIRONMENTAL JUSTICE

The Georgia-Pacific Pulp and Paper Operations meets the criteria for being a "Potential Environmental Justice Area of Concern". Details are shown in Attachment 9.

VIII. PRE AND POST INSPECTION CONTACTS

Date	Type of contact	Person	Comments
2-28-2014	Phone to	James Cutbirth & Richard Freeman	Discussed upcoming inspection
2-28-2014	Email & USPS	James Cutbirth	Notification of the upcoming inspection (Attachment 10)
3-20-2014	Letter from	Molly Matthews	Provided information requested prior to the inspection (Attachment 3).
4-3-2014	Email from	Randy Roden	Discussed products of combustion and requested copy of the inspection report (Attachment 11).
4-3-2014	Letter to	Molly Matthews	Request for MSDS's (Attachment 12)
4-4-2014	Email to	Wakeland to Randy Roden	Reply on products of combustion (Attachment 13).
4-4-2014	Phone to	Molly Matthews	Question about accounting information.
4-7-2014	Phone from	Molly Matthews	Answered questions about accounting and interaction of two plants.
4-7-2014	Email to	Wakeland to Molly Matthews	Questions on one or two establishments (Attachment 14).
4-17-2014	Email from	Randy Roden to Wakeland	Replies on idling trucks, establishments and NAICS codes (Attachments 15).
4-25-2014	Letter from	Molly Matthews	Enclosed with MSDS's (Attachment 12).

IX. INSPECTOR

Lawrence V. Stranne, P.E.
EPCRA 313 Inspector
US EPA Region 6
1445 Ross Avenue
Dallas, TX 75202
214-665-7337
Fax: 214-665-6655
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X. PERSONS INTERVIEWED

Molly A. Matthews
Plant Manager
Georgia-Pacific Chemicals
PO Box 520
Crossett, AR 71635
870-567-7240
Cell: 916-730-4014
Email: molly.matthews@gapac.com

Jerry Morris
R&D Chemist
Georgia-Pacific Chemicals
PO Box 520
Crossett, AR 71635

(Reports to Tommy Atkin)
Randy K. Roden
Chemical Division Environmental Manager – Air
Georgia-Pacific Chemicals LLC
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(Conference call)
Tommy Atkin
Division Environmental Manager

Conference call)
Aimee Risher
Technical Support, Headquarters
Georgia-Pacific

Business cards are shown in Attachment 16.

XI. ENVIRONMENTAL CONSULTANT USED FOR TRI REPORTING

None.

XII. INSPECTION

A. OPENING CONFERENCE

After arriving at the facility at approximately 8:35 am on March 20, 2014, I presented my credentials to Ms. Molly Matthews and the Staff. The purpose of the inspection was explained as a determination of compliance with EPCRA § 313 toxic chemical release reporting requirements for the reporting years 2008 to 2012.

The information sheets for the following areas were given to the facility:

TRI-ME web online reporting
EPCRA Section 313 Region 6 staff
U.S. EPA Small Business Resources
Superfund, TRI, EPCRA, RMP& Oil Information Center
Chemical Safety Awareness for Industrial and Municipal Facilities

A plot plan (map) of the facility is included in the Confidential Business Information folder.

An aerial view of the facility is shown in Attachment 5.

A process flow diagram for the facility is included in the Confidential Business Information folder.

The Staff explained that the Chemicals Operations does not receive any inputs from the Pulp and Paper Operations and does not ship any finished products to the Pulp and Paper Operations.

B. CONFIDENTIAL BUSINESS INFORMATION

All of the material (including a map and a flow chart) collected at the time of the inspection was marked CONFIDENTIAL BUSINESS INFORMATION (CBI). A listing of the information collected at the time of the inspection is included in the CBI folder. The information collected at the time of the inspection is included in CBI Folder 1. CBI collected or generated since the inspection is included in CBI Folder 2.

When the inspection report is complete the CBI will be given to the EPCRA § 313 CBI Officer, David Riley.

C. REQUEST FOR A COPY OF COMPLETED INSPECTION REPORT

In an email dated April 3, 2014, Mr. Randy Roden requested a copy of the completed inspection report (Attachment 11).

D. RATIONAL FOR THE GP COMPLEX REPORTING AS THREE SEPARATE ELSTABLISHMENTS.

The Georgia-Pacific Crossett Complex consisted of three establishment from 2008 to 2011. The Plywood/Stud Mill ceased operations in October 2001 which resulted in only two establishment reporting in 2012.

During the inspection of the GP Paper Operations on March 19, 2014, the Staff explained that each of the three establishments (the Pulp and Paper Operations, the Chemicals Operations and the Plywood/Stud Mill) is in a different Division of GP. Each Division has its own chain of management and financial results. GP Management wanted the environmental reporting also separated by the three Divisions.

E. STATUS OF INFORMATION REQUESTED PRIOR TO THE INSPECTION

In an email and USPS letter dated February 28, 2014, Mr. James Cutbirth was requested to notify Ms. Molly Mathews of the time and date of the inspection (Attachment 10). The letter contained an attachment that listed the material that should be available at the time of the inspection.

All of the requested information was available at the time of the inspection.

F. INFORMATION REQUESTED SUBSEQUENT TO THE INSPECTION

In a letter sent April 3, 2014, Ms. Molly Matthews was requested to supply copies of the MSDS for all products used by the facility that contained TRI chemicals

(Attachment 12). The MSDS's were received May 5, 2014, by Priority Mail. Ms. Molly Matthews' letter of April 25, 2014, was enclosed in the shipment (Attachment 12). The MSDS's were placed in the file folder.

G. FACILITY OWNERSHIP INFORMATION

Georgia-Pacific has owned and operated the facility during the period of the inspection, reporting years 2008 to 2012 (Attachment 7).

H. FACILITY INFORMATION, EMPLOYEES AND GROSS SALES

The facility currently has approximately 150 employees.

Ms. Molly Matthews provided a document stating the following number of employees and sales (Attachment 3).

Reporting year	More or less than 50 employees	More or less than $10 million sales
2112	More than	More than
2011	More than	More than
2010	More than	More than
2009	More than	More than
2008	More than	More than

I. MONITORING / MEASUREMENT DATA COLLECTION

In her letter dated March 20, 2014, Ms. Molly Matthews provided the following information on the collecting, monitoring and measurement of data (Attachment 3):

> As set forth in more detail in the calculation spreadsheets that will be provided during your visit, GP's Crossett Chemical Facility utilizes many different types of data collected pursuant to regulatory monitoring/measurement requirements to calculate releases of EPCRA 313 chemicals reported by the Facility. The following chart summarizes those regulatory monitoring/measurement requirements for which the Facility gathers monitoring or measurement data on an ongoing basis. Please note that, based on our understanding of the scope of your information, this chart does not include all ongoing monitoring or measurements that the Facility may conduct for reasons other than regulatory compliance, nor does it include every monitoring or measurement that the Facility may have conduct for regulatory applicability or permitting purposes. To the extent the Facility relies on any monitoring or measurements to support its calculations of EPCRA chemical releases, such data and the corresponding calculation methodologies for particular reporting years are available in the spreadsheets that will be provided during your visit.

Type of Data	ECPRA 313 Chemicals Monitored or Measured	Regulatory Requirement	Monitoring or Measurement Methodology	Activities/Operations Covered by Data
Stack Tests	Formaldehyde, Methanol, Phenol, Acetaldehyde, Epichlorohydrin, (EPI), Ammonia, Cresols, Acrolein, Toluene, Hexane, Maleic Anhydride, Proprionaldehyde, Hydrogen Chloride	Title V Permit, Conditions #: 7, 13, 30, 47, 52, 101.	Stack Testing: EPA Test Method 26 (Hydrogen Chloride) and Method 320 for other compounds.	Air emissions from the HON oxidizer, Resin Plant RTO, Complex Boiler/Backup Oxidizer, and Spray Dryer Exhaust Stack
Leak Detection (LDAR) Monitoring Data	* Calibrated using propane to detect certain organics such as methanol, formaldehyde or EPI, ethylene glycol, cresols	Title V Permit, Specific Conditions # 36; Plant wide Conditions # 18-24. 40 CFR 63, Subparts H and UU.	LDAR Monitoring: EPA Test Method 21	Air emissions from regulated LDAR components throughout the facility.
MON Wastewater Characterization	Acetaldehyde, Ammonia, Benzene, Formaldehyde, Methanol, Phenol, Toluene, Chloroform, Chloromethane and others found to be Non Detect (ND)	Title V Permit, Specific Conditions # 155. 40 CFR 63, Subpart FFFF.	Wastewater Sampling: EPA Test Methods: 624, 625, 1667, 8015B	Wastewater Collection and Transfer System

"*"LDAR monitoring is not conducted to measure concentrations of specific EPCRA 313 chemicals; rather, the monitoring measures certain organic compounds such as methanol, formaldehyde, phenol and EPI.

J. WASTEWATER TREATMENT

The Crossett Pulp and Paper Operations provide waste water treatment services for itself, the Chemical Operations and the Plywood/Stud Mill.

All storm water is collected and sent to the waste water treatment plant.

K. SANITARY WASTEWATER

The Chemicals Operations sanitary wastewater passes through an onsite septic system. The overflow discharges to the Pulp and Paper Operations wastewater treatment plant. It does not mix with the process wastewater. All of the Chemical Operations' water discharges (storm water, process and sanitary) go to the Pulp and Paper Operations wastewater treatment system.

L. PROCESS WATER

Make up process water is drawn from Lake Georgia-Pacific which is north of the facility. The water is chlorinated and distributed to the Pulp and Paper Operations, the Chemicals Operations and the Plywood/Stud Mill.

M. RAW MATERIAL

Raw materials are purchased from outside suppliers.

The major raw materials are:

Urea	Resin mix extenders	Resin mix fillers
Phenol	Sodium hydroxide	Ammonia
Formic acid	Sulfuric acid	Methanol
Formaldehyde	Tall oil	

N. PROCESS DESCRIPTION

A process flow chart is shown in the Confidential Business Information Folder 1.

O. FINAL PRODUCTS

The final products are:

Tall oil	Liquid resin	Dry resin
Formaldehyde	Urea formaldehyde	

P. ORIGINAL POSTMARK DATES OF SUBMITTED FORM R's/A's

The original postmark dates of the Form R's submitted for reporting years 2008 to 2012 were on or before the final due date (Attachment 17).

Q. CHEMICALS REPORTED TO THE TRI DATABASE

Attachment 18 is a listing showing the number of establishment that reported each chemical.

The facility reported the chemicals shown in the table below to the TRI database (Attachment 17 and 18).

Chemical usage is included in the Confidential Business Information, Folder 1.

CHEMICALS REPORTED TO THE TRI

Chemical	2012	2011	2010	2009	2008
Acetaldehyde	Reported	Reported	Reported	Reported	Reported
Ammonia	Reported	Reported	Reported	Reported	Reported
Barium compounds	Reported	Reported	Reported	Reported	Reported
Benzo(g,h,i)perylene	Reported	Reported	Reported	Reported	Reported
Catechol	Reported	Reported	Reported	Reported	Reported
Chlorine	Reported	Reported	Reported	Reported	Reported
Cresol (mixed isomers)	Reported	Reported	Reported	Reported	Reported
Epichlorohydrin	Reported	Reported	Reported	Reported	reported
Ethylene glycol	Reported	Reported	Reported	Below threshold	Reported
Formaldehyde	Reported	Reported	Reported	Reported	Reported
Formic acid	Reported	Reported	Reported	Reported	Reported
Hydrochloric acid aerosols	Reported	Reported	Reported	Reported	Reported
Lead compounds	Reported	Reported	Reported	Reported	Reported

CHEMICALS REPORTED TO TRI CONTINUED

Chemical	2012	2011	2010	2009	2008
Maleic anhydride	Reported	Reported	Reported	Reported	Reported
Manganese compounds	Reported	Reported	Reported	Reported	Reported
Mercury compounds	Reported	Reported	Reported	Reported	Reported
Methanol	Reported	Reported	Reported	Reported	Reported
Phenol	Reported	Reported	Reported	Reported	Reported
Polycyclic aromatic compounds	Reported	Reported	Reported	Reported	Reported
Toluene	Reported	Reported	Reported	Reported	Reported
Vanadium compounds	Reported	Reported	Reported	Reported	Reported
Zinc compounds	Reported	Reported	Reported	Reported	Reported

R. CHEMICALS OF INTEREST IDENTIFIED PRIOR TO THE INSPECTION

Acetaldehyde

The chemical dictionary description for acetaldehyde is shown in Attachment 19.

The Form R information for acetaldehyde is shown below:

ACETALDEHYDE

Form R line number	2012 pounds	2011 pounds	2010 pounds	2009 pounds	2008 pounds
5.1 fugitive air **Note 1**	1,200	1,200	0	0	0
5.2 stack air	3,000	2,100	6,500	6,900 **Note 2**	240 **Note 2**
7A treatment methods on-site	H040	H040	H040	H040	H040
8.1b other releases on-site	4,200	3,300	6,500	6,900	240
8.6 treated on-site	27,000	28,000	33,000	31,000	22,000
8.9 production ratio	0.81	0.9	1.27	1.15	0.81

Note 1: The facility had new test data and a new air permit for 2011 and 2012.

Note 2: The facility had a new stack test for 2009.

Ammonia

The chemical dictionary description for ammonia is shown in Attachment 20.

The Form R information for ammonia is shown below.

AMMONIA

Form R line number	2012 pounds	2011 pounds	2010 pounds	2009 pounds	2008 pounds **Note 2**
5.1 fugitive air	750	730	24	18	15
5.2 stack air	2,700	4,000	3,900	3,800	17,000
6.2 transfer off-site	205	92,000	6	280 23	21
7A treatment methods on-site	H040	H040	H040	H040	H040
8.1b other releases on-site	3,500	4,700	3,900	3,818	17,000
8.1c wells & landfills off-site	250				20
8.6 treated on-site **Note 1**	0	0	0	0	0
8.7 treated off-site		92,000		280	
8.9 production ratio	0.93	1	1	1.05	0.79

Note 1: Treatment method H040 (incineration) is shown with a treatment efficiency between 95% and 99%. It would be expected that a value other than 0 be shown on line 8.6.

Note 2: Test data was not available for 2008 and another facility's test data was used as best available. Onsite test data was available for 2009 to 2012.

Barium compounds

The Form R information for barium compounds is shown below:

BARIUM COMPOUNDS

Form R line number	2012 pounds	2011 pounds	2010 pounds	2009 pounds	2008 pounds
5.1 fugitive air	NA	NA	NA	NA	NA
5.2 stack air	0	0	0	0	0
8.1b other releases on-site	0	0	0	0	0
8.9 production ratio	0.9	0.89	1.27	0.86	102

Barium compounds, while below threshold at the Chemical Operations, was reported as other uses at the Pulp and Paper Operations and the Plywood/Stud Mill were above threshold.

Benzo(g,h,i)perylene

The Form R information for benzo(g,h,i)perylene is shown below:

BENZO(G,H,I,)PERYLENE

Form R line number	2012 pounds	2011 pounds	20110 pounds	2009 pounds	2008 pounds
5.1 fugitive air	NA	NA	NA	NA	NA
5.2 stack air	0.00042	0.00044	0.00041	0.00041	0
8.1b other releases on-site	0.00042	0.00044	0.00041	0.00041	0
8.9 production ratio					

Benzo(g,h,i)perylene is manufactured during the burning of natural gas in the boiler.

Benzo(g,h,i)perylene, while below threshold at the Chemical Operations, was reported as the use at the Pulp and Paper Operations and the Plywood/Stud Mill were above threshold.

Chlorine

NALCO type chemicals are used to treat the water in the facility's cooling towers. During the use the chemicals manufacture chlorine some of which is released into the air and is reported as stack emissions.

The form R information for chlorine is shown below:

CHLORINE

Form R line number	2012 pounds	2011 pounds	2010 pounds	2009 pounds	2008 pounds
5.1 fugitive air	0	0	0	0	0
5.2 stack air	150	250	300	240	520
8.1b other releases on-site	150	250	300	240	520
8.9 production ratio	Blank	Blank	Blank	Blank	Blank

Cresol

The Form R information for cresol is shown below:

CRESOL

Form R line number	2012 pounds	2011 pounds	2010 pounds	2009 pounds	2008 pounds
5.1 fugitive air	60	60	61	61	63
5.2 stack air	60 **Note 1**	3	3	3	3
6.2 transfer off-site			310	0	0
7A treatment methods on-site	H040	H040	H040	H040	H040
8.1b other releases on-site	120	63	64	64	66
8.6 treated on-site	3,100	0	1	1	1
8.9 production ratio	0.93	0.97	1	1.05	1.01

Note 1: A new TO (thermal oxidizer) was installed in 2012 and a new stack test was conducted. The previous stack test was conducted on July 15, 2003.

Ethylene glycol

Ethylene glycol is used as a heat transfer agent.

For 2009 the total usage of ethylene glycol at the Pulp and Paper Operations, the Chemical Operations and the Plywood/Stud Mill was below threshold (Confidential Business Information Folder 2, tab 6).

Lead and lead compounds

Lead compounds are manufactured in the burning of natural gas in the boiler and diesel fuel in the emergency generators.

The Form R information for lead compounds is shown below:

LEAD COMPOUNDS

Form R line number	2013 pounds	2012 pounds	2011 pounds	2010 pounds	2009 pounds
5.1 fugitive air	NA	NA	NA	NA	NA
5.2 stack air	1	1	1	1	2
6.2 transfer off-site			0.0073	0	0
8.1b other releases on-site	1	1	1	1	2
8.1d other releases off-site			0.0073		
8.9 production ratio	Blank	Blank	Blank	Blank	Blank

Nitrate compounds

Nitrate compounds are not manufactured, processed or otherwise used at the facility.

Sulfuric acid aerosols

Sulfuric acid aerosols are not manufactured, processed or otherwise used at the facility.

S. OTHER ITEMS OF INTEREST

Boiler

The facility has one boiler fired with natural gas and tail gas from processes within the facility. The boiler is used to generate steam for the facility.

Products of combustion from motor vehicles

During the tour of the facility it was noticed that several diesel trucks were left idling while they were being loaded or unloaded. The Staff was asked if the resulting releases were included in the facility's release calculations. The Staff expressed the opinion that products of combustion from motor vehicles were exempt.

The Staff was asked to justify their position and reply.

In an email dated April 3, 2014, Mr. Randy Roden provided Georgia-Pacific's rational for concluding that the products of combustion are exempt (Attachment 11). His reply contained the following statements (Attachment 11):

> This e-mail provides the follow-up you requested during your March 20 visit to Georgia-Pacific Chemicals LLC's facility in Crossett, Arkansas. Specifically, during your walk around the plant site, you noticed a tanker truck idling at the guardhouse and asked whether emissions associated with that idling truck were accounted for in Crossett Chemicals' TRI calculations. As I informed you during your visit, Crossett Chemicals has not accounted for emissions from idling tanker trucks in its TRI calculations and Form R submissions. In response to your inquiry, we have researched the available EPCRA statute, regulations and EPA guidance and have concluded that these emissions are exempt from TRI reporting calculations pursuant to EPCRA Section 327. Section 327 provides that, except for the emergency release reporting provisions of EPCRA Section 304, EPCRA "does not apply to the transportation, including the storage incident to such transportation, of any substance or chemical subject to the requirements of this chapter, including the transportation and distribution of natural gas." This exemption is discussed further in response to Question No. 533 in EPA's guidance document, *EPCRA 313 Questions and Answers* (Rev. 1998 Version). In that document, EPA explained that releases from a tank truck delivering gasoline to a covered facility would be exempt from reporting under EPCRA Section 313. Based on this statutory provision and the associated guidance, we believe that releases from a truck idling at the gate to the Crossett Chemicals' facility would similarly be exempt from TRI reporting requirements. As is often the case at our facility, arriving trucks must idle at our guardhouse while their drivers wait for entry to our facility and thus would still be in transit and covered by the exemption set forth in EPCRA Section 327.

A copy of Question and Answer 553 is shown below:

> **533. A *covered facility* receives a shipment of gasoline from a tank truck. The loading dock is located within the *facility* boundaries. The tank truck delivers gasoline through a hose into the tank operated by the *facility*. While stationed at the dock, the valve of the tank truck ruptures and the gasoline leaks from the hose of the tank truck. This *release***

occurs before the shipping papers are signed off by the *facility* operator. Gasoline contains listed Section 313 *toxic chemicals* such as benzene. If an activity threshold for benzene is met, would the *facility* be required to report this quantity of benzene *released* on the Form R?
No. In the above case, the chemicals in the tank truck are considered under active shipping until the shipping papers are signed at the loading dock. Section 327 of EPCRA states that "(except as provided in Section 304, this title does not apply to the transportation, including the storage incident to such transportation, of any substance or *toxic chemical* subject to the requirements of this title, including the transportation and distribution of natural gas." In the above scenario, the material in the tank truck is considered to fall under the transportation exemption, and *releases* from this truck would be exempt from reporting under Section 313. This *release*, however, would be reportable under Section 304 of EPCRA, if the quantity of any extremely hazardous substance (EHS) or CERCLA hazardous substance released exceeds the reportable quantity (RQ) within a period of 24 hours. EPA would encourage the *facility* to include the amount in its Form R in order to provide the public with the full picture of benzene *releases* that occurred at the facility for that reporting year.

Mr. Roden's email was referred to Dr. Morton Wakeland for comment. Dr. Wakeland replied to Mr. Roden in an email dated April 4, 2014, and informed Mr. Roden that the products of combustion from motor are not exempt and should be taken into consideration when doing threshold calculations (Attachment 13). Dr. Wakeland's reply contained the following comments:

> Larry informs me you folks have been discussing the possibility of reporting emissions from idling vehicles at your facility in Crossett, Arkansas.
>
> He provided me a copy of your response to him on April 3rd.
>
> First let me address your interpretation of Q&A 533 and its applicability to this situation.
>
> Q&A 533 does not apply in this situation. Why? Q&A 533 addresses the transportation of a product (gasoline in this instance) which contains TRI chemicals (benzene for example). In your situation, however, the issue is not about transportation, rather it is about the coincidental manufacturing of combustion byproducts from a motor vehicle (see Q&A 285) on-site.
>
> It is important for you, and Georgia Pacific for that matter, to realize the ***motor vehicle exemption*** only applies to the ***"otherwise use"*** of the TRI chemical, it does not apply to the "manufacturing, including coincidental manufacturing, and processing" of TRI chemicals.

> Therefore, unless other information is provided to alter our interpretation, Georgia Pacific needs to determine if the TRI chemicals coincidentally manufactured from idling vehicles at the facility exceed the 25,000 pound threshold.
>
> If you have additional questions or comments feel free to write or call. I am out of the office today, but will return Monday.
>
> We do most appreciate your cooperation in this matter.

In an email dated April 17, 2014, Mr. Randy Roden provided the following additional comments on the products of combustion from idling trucks (Attachment 15):

> Idling Tanker Trucks
>
> In your response, you discussed the motor vehicle exemption set forth in 40 CFR 372.8(c)(4). This exemption applies to "the use of products containing toxic chemicals for the purpose of maintaining motor vehicles operated by the facility." Our position regarding the exemption of TRI chemical releases associated with idling trucks outside our guardhouse that are operated by third parties is not based on the motor vehicle exemption. Rather, we believe emissions associated with the transportation of materials to/from our plant by third parties are exempt from TRI reporting under Section 327 of the EPCRA statute. We understand this statutory transportation exemption in EPCRA Section 327 to be a separate and broader exemption than the regulatory motor vehicle exemption.
>
> Q&A 533 is the only Q&A we could locate that directly discusses the statutory transportation exemption, and we continue to believe this supports our interpretation for third party operated trucks that might be idling at our guardhouse. This Q&A stands for the proposition that any releases of a TRI chemical that occur in transit (i.e., before shipping papers are signed) do not fall within the scope of TRI reporting. By that same rationale, the manufacturing of combustion byproducts that are incidental to transportation should also be exempt from TRI reporting.

Relationship of the two chemical plants to one another

In a phone conversation on April 7, 2014, Ms. Molly Matthews stated that at the Crossett site a separated set of accounting books are kept for each of the two chemicals plants which are later rolled up to Georgia-Pacific LLC. She also stated that some chemicals are transferred to the tall oil plant from the resin plant. The two chemical plants share a common boiler.

In an email dated April 17, 2014, Mr. Randy Roden provided the following additional information on the GP Chemicals' one establishment (Attachment 15):

"Establishment"

You asked Molly Matthews, our Plant Manager, whether our plant consists of two "establishments", as that term is used in 40 CFR 372.3. You also asked for an explanation of resins and tall oil production units at our plant. In brief, the resins production unit manufactures urea-formaldehyde resins, phenol-formaldehyde resins, urea formaldehyde concentrate, and wet strength resins. The tall oil fractionation unit fractionates crude tall oil into rosin and tall oil fatty acid and also produces formulated products, blends and rosin derivatives. These are two distinct product groups (tall oil-based and resin-based) sold by Georgia-Pacific Chemicals LLC (GPC), and are tracked separately for accounting purposes at the facility level, as Mrs. Matthews previously discussed with Mr. Stranne.

Notwithstanding the operation of two distinct product groups, the Crossett Chemical Plant is owned and operated by a single entity, GPC. The two product groups at the Plant do have employees that are dedicated (from an accounting perspective) to a particular product group, but they also share personnel at the facility-level. Specifically, both product groups share a common Plant Manager and Responsible Official (Molly Matthews), as well as accounting, logistics, maintenance, security, EHS, and HR capabilities, all of whom are located at the Crossett Chemical Plant. From an operational perspective, the two product groups also share a common boiler, utilities, and some process equipment. For example, the spray dryer at the Chemical Plant is used to produce both tall oil-based products and resin-based products. Given the common ownership and operational oversight of these two product groups at the Crossett Chemical Plant, we continue to treat the Plant as a single establishment for purposes of TRI reporting.

NAICS Codes

In an email dated April 7, 2014, Dr. Wakeland requested information related to the NAICS codes used by GP Chemicals (Attachment 14).

In an email dated April 17, 2014, Mr. Randy Roden provided the following additional information on the NAICS codes used by the facility (Attachment 15):

NAICS Codes

You also asked Mrs. Matthews for clarification regarding the NAICS codes referenced in the plant's 2012 Form R. The Form R includes a reference to NAICS code 325191, which is described as "Gum and Wood Chemical Manufacturing", in recognition of the tall oil production process discussed above. You note in your e-mail that effective in the 2012 calendar year, NAICS code

325191 no longer exists, and apparently has been subsumed within NAICS code 325194.

We do not believe our failure to capture this NAICS code change constitutes a data quality error in our Form R for Reporting Year 2012, as the regulations in existence at the time we submitted our 2012 Form R prescribed the use of 2007 NAICS codes. EPA's Form R instructions for Reporting Year 2012 state that "…facilities are required to use 2007 NAICS codes on TRI reporting forms." That requirement was set forth in 40 CFR 372.22(b). The 2007 NAICS code for Gum and Wood Chemical Manufacturing is 325191, and thus it appears that was the correct code to use for Reporting Year 2012.

Although NAICS Code 325191 may have been subsumed into NAICS code 325194 in 2012, that change was not incorporated into the Form R reporting requirements for Reporting Year 2012. Based on our research, that change was codified via a direct final rule that was published in the Federal Register on July 18, 2013 (78 Fed. Reg. 42875), after the Form R reporting deadline for Reporting Year 2012. Pursuant to this rulemaking as well as EPA's Form R instructions for Reporting Year 2013, this change will be incorporated in Form R's that are due on July 1, 2014.

I should also note that as of April 08, 2014, the EPA's TRI-MEweb system had not incorporated this NAICS code change, as the drop-down menu for NAICS codes still contained NAICS code 325191, but not NAICS code 325194. Another review of the TRI-Meweb system this morning shows that the NAICS code 325194 is now an option in the drop down menu. As such, NAICS code 325194 will be incorporated into our Form R's for Reporting Year 2013.

T. MATHEMATICAL PROCEDURES FOR CALCULATIONS

A sheet explaining the "Methodology of Calculation of Emissions, Onsite Treatment and Transfers" is in the Confidential Business Information Folder 1.

The computer program for calculating thresholds and releases was developed by and is now maintained and modified by Mr. Randy Roden. He explained in considerable detail how the calculations are done.

U. MATHEMATICAL PROCEDURES FOR USE OF FORM A's

The establishment did not utilize Form A's for reporting for the years 2008 to 2012.

V. LATITUDE AND LONGITUDE

Source	Latitude	Longitude	Comments
Facility Registry System (FRS)	33.13847	-91.96584	(Attachment 5)
Inspector	33-08.225 33.1375	-91-58.040 -91.9673	Readings taken in the visitors' parking lot on the south side of the office building (Attachment 21).
Google Maps	33.13847	-91.96584	Center of Manufacture (Attachment 5B). Appears to be the same as the FRS lat and lon. Difficult to determine.

W. FACILITY COMMENTS ON SAFETY AND HOUSEKEEPING

Prior to the facility tour the Inspector was requested to comment on any safety and housekeeping items that might be noticed during the tour. The following information was contained in Mr. Randy Roden's email dated April 3, 2014, (Attachment 11).

> Additionally, I wanted to let you know that our facility has been working to follow up on your safety-related observations from your visit. Some of these items, such as securing compressed gas cylinders and removing pallets from a walkway, were addressed on the day of your visit. Other observations you made, such as the anchoring of portable building to the ground and improving the visibility of fire extinguishers, are the subject of continued discussions and analysis by our safety leaders. We appreciate your observations.

X. CLOSING CONFERENCE

The Staff was cooperative during the inspection.

The inspection was concluded at approximately 3:30 pm.

Lawrence V. Stranne, P.E.
EPCRA 313 Inspector

Attachments:
1. Idling of Plywood/Stud Mill
2. Notify State of Arkansas
3. 3-20-2014 Molly Matthews letter
4. DUNS numbers
5. FRS lat and lon

6. Facility web site
7. Facility history
8. 2010 Arkansas Manufacturers Register
9. 5-15-2014 Environmental Justice Report
10. 2-28-2014 inspection notification letter
11. 4-3-2014 Randy Roden email, products of combustion
12. 4-3-2014 letter to Molly Matthews requesting MSDS's
13. 3-4-2014 email Morton Wakeland to Randy Roden, products of combustion
14. 4-7-2014 email Morton Wakeland to Molly Matthews, two chemical plants
15. 4-17-2014 email Randy Roden to Morton Wakeland, establishments
16. Business cards
17. Form R submissions
18. Chemicals reported at each of the three establishments
19. Chemical dictionary information on acetaldehyde
20. Chemical dictionary information on ammonia
21. Inspector's lat and lon readings